

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Latoya Neshall Miller
Marvin Sancheze Miller, Debtors**

**Case No. 21-51103-KMS
CHAPTER 13**

RESPONSE

COME NOW, Debtors, by and through counsel, and respond to Trustee's Motion to Dismiss (dk # 73) as follows:

1. Debtors commenced this case on October 19, 2021 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtors can continue making the plan payments.

WHEREFORE, Debtors pray for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

Of Counsel:

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 28, 2025, to:

By Electronic CM/ECF Notice:

Warren Cuntz

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.